

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

YORON COHEN,

Plaintiff,

v.

JONES LANG LASALLE IP, INC.,  
PETER RIGUARDI,  
and STEPHEN SCHLEGEL,

Defendants.

No. 17-CV-03471

**PLAINTIFF'S INITIAL DISCLOSURES  
PURSUANT TO FRCP 26(a)(1)**

Pursuant to Federal Rules of Civil Procedure Rule 26(a)(1), plaintiff Yoron Cohen ("Plaintiff"), by and through his undersigned attorneys, hereby submits his initial disclosures to defendants Jones Lang LaSalle IP, Inc. ("JLL"), Peter Riguardi and Stephen Schlegel (collectively, "Defendants"). These initial disclosures are made based on information that is reasonably available to Plaintiff at this time and at this stage of the proceedings. Plaintiff makes these disclosures: (1) without admitting or conceding the admissibility or relevance of any of the information disclosed or referenced; (2) without prejudice to his rights to invoke the attorney-client privilege, work-product doctrine, or any other privilege or immunity pertaining to any of the information disclosed or referenced; (3) without prejudice to his rights to object to the use of any of the information disclosed or referenced in this or any other proceeding or action; and (4) while reserving the right to supplement or amend these initial disclosures and/or to use documents not described herein as more information becomes available during the course of this action. Plaintiff reserves the right to use any documents or information disclosed or provided by

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| New York, New York 10065   | <ul style="list-style-type: none"> <li>• The true facts</li> <li>• Defendants' age discrimination against Plaintiff</li> <li>• All matters raised in the Complaint</li> </ul>   |
| Yoav Oelsner<br>c/o Michael L. Banks, Esq.<br>Morgan, Lewis Bockius LLP<br>Philadelphia, Pennsylvania 19103  | <ul style="list-style-type: none"> <li>• The falsity of Defendants' statements</li> <li>• The true facts</li> <li>• Defendants' age discrimination against Plaintiff</li> <li>• All matters raised in the Complaint</li> </ul>  |
| Michael Pallas<br>c/o Michael L. Banks, Esq.<br>Morgan, Lewis Bockius LLP<br>Philadelphia, Pennsylvania 19103  | <ul style="list-style-type: none"> <li>• The falsity of Defendants' statements</li> <li>• The true facts</li> <li>• Defendants' age discrimination against Plaintiff</li> <li>• All matters raised in the Complaint</li> </ul>  |
| Glenn Tolchin<br>c/o Michael L. Banks, Esq.<br>Morgan, Lewis Bockius LLP<br>Philadelphia, Pennsylvania 19103   | <ul style="list-style-type: none"> <li>• The falsity of Defendants' statements</li> <li>• The true facts</li> <li>• Defendants' age discrimination against Plaintiff</li> <li>• All matters raised in the Complaint</li> </ul>  |
| Gavin Morgan<br>CBRE<br>Henrietta House<br>Henrietta Place<br>London, W1G 0NB  | <ul style="list-style-type: none"> <li>• The falsity of Defendants' statements</li> <li>• The true facts</li> <li>• Defendants' age discrimination against Plaintiff</li> <li>• All matters raised in the Complaint</li> </ul>  |
| Officers, employees, contractors<br>and agents of JLL currently<br>unknown to Plaintiff<br>c/o Michael L. Banks, Esq.<br>Morgan, Lewis Bockius LLP<br>Philadelphia, Pennsylvania 19103 | <ul style="list-style-type: none"> <li>• The falsity of Defendants' statements</li> <li>• The true facts</li> <li>• Defendants' age discrimination against Plaintiff</li> <li>• All matters raised in the Complaint</li> </ul>  |
| Mark Maurer<br><i>The Real Deal</i><br>450 West 31st Street, 4th Floor<br>New York, New York 10001   | <ul style="list-style-type: none"> <li>• The actions taken by <i>The Real Deal</i> to investigate, write, edit and/or publish the subject article</li> <li>• The defamatory statements JLL and the other defendants made to Mr. Maurer and <i>The Real Deal</i>.</li> </ul> |
| Editors and/or other individuals   | <ul style="list-style-type: none"> <li>• The actions taken by <i>The Real Deal</i> to</li> </ul>  |

this case, which involves a claim for defamation in addition to claims for age discrimination, and the economic and non-economic harm suffered by Plaintiff as a result of Defendants' conduct, the calculation of the precise amount of Plaintiff's damages will require expert analysis and testimony, and Plaintiff reserves the right to supplement this disclosure and/or to present additional theories of damages that are discovered or developed during the pendency of the action.

4. **For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Not applicable.

Dated: October 10, 2017

Respectfully submitted,

By: /s/ Charles J. Harder  
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